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7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA

9 UNITED STATES OF AMERICA,)
10 Plaintiff,) CASE NO. 2:15-CR-00212-JCM-NJK
11 vs.)
12 CHARLES PARKIN,)
13 Defendant.)
14

15 **STIPULATION TO CONTINUE MOTIONS DEADLINE**
16 **(First Request)**

17 IT IS HEREBY STIPULATED AND AGREED, between the United States of America,
18 through its attorneys, DAYLE ELIESON, United States Attorney, and ALEXANDRA M.
19 MICHAEL, Assistant United States Attorney, and the Defendant, CHARLES PARKIN, through his
20 counsel, RUSSELL E. MARSH, ESQUIRE, WRIGHT MARSH & LEVY, that the current schedule
21 for filing and responding to pretrial motions be vacated and extended for one month. This
22 stipulation is entered into for the following reasons:

23 1. By Order of the Court dated November 15, 2018, any pretrial motions are now due
24 on December 17, 2018; responses to any motions shall be filed within 14 days from the date of
25 service of the motions; and any replies may be filed within 7 days of service of the responses.

26 2. The parties continue to engage in plea negotiations in an effort to resolve this matter
27 without the need for trial or the filing of motions.

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1 3. AUSA Michael has been occupied with trial in United States v. Brian Wright, Case
2 No. 2:17-CR-00160-JAD-VCF, which took place in December 2018.

3 4. The parties agree that the new motions schedule shall be as follows: The parties shall
4 have until January 17, 2019, to file any pretrial motions and notices of defenses. The parties shall
5 have 14 days from the service of motions to file any responsive pleadings. Any replies shall be due
6 within 7 days of service of any responses.

7 5. This is the parties' first request to continue the motions schedule. Mr. Parkin is not
8 in custody and agrees with this request.

9 WHEREFORE, the United States of America, and the Defendant, Charles Parkin, request
10 that the motions schedule be continued for one month as set forth above.

11 DATED: January 7, 2019

12 WRIGHT MARSH & LEVY

DAYLE ELIESON
United States Attorney

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14 By /s/ Russell E. Marsh
15 RUSSELL E. MARSH, ESQUIRE
16 300 S. Fourth Street
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19 Attorney for Defendant Parkin

By /s/ Alexandra M. Michael
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1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA
3

4 UNITED STATES OF AMERICA,)
5 Plaintiff,)
6 vs.)
7 CHARLES PARKIN,)
8 Defendant.)
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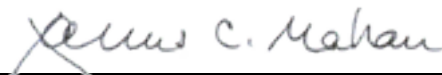
CASE NO. 2:15-CR-00212-JCM-NJK

ORDER

10 Based upon the pending Stipulation of counsel and good cause appearing, the Court hereby
11 grants the joint request and extends the motions schedule as follows: The parties shall have until
12 January 17, 2019, to file any pretrial motions and notices of defenses. The parties shall have 14 days
13 after service of the motions file any responsive pleadings to these motions. Any replies shall be due
14 within 7 days of the service of the responses.

15 SO ORDERED.

16 Dated: January 8, 2019.

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JAMES C. MAHAN
UNITED STATES DISTRICT JUDGE
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